

**REMARKS**

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3 The Applicants respectfully request reconsideration and Allowance of Claims 1-20 in  
view of the amendments above and the following arguments.

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**35 U.S.C. §102 REJECTIONS**

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8 Claims 1-4, 6-16, 18 and 20 were rejected under 35 U.S.C. §102(e) as anticipated by  
Wood et al., U.S. Patent 6,453,127 ("Wood").

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**35 U.S.C. §103 REJECTIONS**

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13 Claims 5, 17 and 19 were rejected under 35 U.S.C. §103(a) as obvious over Wood in  
view of U.S. Publication No. 20040068549 to Motoyama ("Motoyama").

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**STATUS OF THE CLAIMS**

17 Claims 2 and 6 have been cancelled.

18 Claims 1, 3-5, and 7-20 remain pending in this case. Each of the independent claims,  
claims 1, 16 and 18, have been amended to include the limitation that the printer object is a  
network addressable printer object and that the universal remote interface assembly  
receives from a remote communications device a document command for accessing the  
document storage assembly and identifying a particular stored document and for identifying  
a particular network addressable printer object and for transmitting a print job for the  
particular stored document and print job command to the particular network addressable  
printer object. These amendments do add limitations to the claims.

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**CLAIMS 1, 3, 4, 7-16, 18 AND 20 ARE NOT ANTICIPATED BY THE CITED ART**

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30 The Examiner rejected Claims 1-4, 6-16, 18 and 20 under 35 U.S.C. § 102 as  
anticipated by Wood.

32 Applicants respectfully traverse these rejections on the ground that Wood, either  
alone or in combination, does not teach or suggest Applicants' invention as now claimed.

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## **THE WOOD PATENT**

The stated objective of the Wood device is to facilitate a user's ability to run a copier or printer while the user is at a remote location. (Column 1, lines 9-11) Wood accomplishes this by enabling the remote workstation 11 to download the user interface to the remote workstation 11 which the user manipulates to cause the document to be printed on the company printer 15 near computer 30. (Column 5, lines 54-67 and Column 6, lines 1-54). That is, in this version, Wood requires data from the computer concerning the printer to be loaded on the remote workstation.

Alternatively, Wood provides the ability of a user at a remote workstation 11 to access the computer 30 through an access code communicating via socket 17 so that the user can cause a document to be printed on the company printer already connected to computer 30. (Column 6, lines 66-67 and Column 7, lines 1-9). Here, Wood simply provides remote access to computer 30 to operate it as if the user was present at computer 30.

In neither case does the remote workstation send information to the computer identifying a particular document. Likewise, in neither case does the remote workstation send the computer information identifying a particular remote network addressable printer object to which the particular document is to be sent.

Further as to Wood, the Examiner concedes that Wood does not teach or suggest interfacing by means of a Simple Mail Transfer Protocol server as will be more fully discussed with regard to the Motoyama publication. (Examiner's Office Action Page 6).

## **THE MOTOYAMA PUBLICATION**

The Motoyama publication claims the benefit of a co-pending application for methods and systems in which an electronic network message regarding the status of a network resource is received by a service center or resource manager. When it is determined that urgent service is needed by a network resource, the network resource may send a status message directly to the resource manager. (paragraph [0014]). Thus, all of the subject devices are network resources (company printers and such) known to the service center.

As the Examiner has pointed out, Motoyama does disclose the use of the STMP protocol in sending the electronic network messages regarding the status of network resources from the network resource to and from the service center. (paragraph [0076]).

Because it was cited only for disclosing the SMTP element, it is admitted that nowhere in Motoyama is it disclosed or suggested that a remote user sends information to the service center computer identifying a particular document. Likewise, nowhere in Motoyama does a remote user send the service center computer information identifying a particular remote network addressable printer object to which the particular document is to be sent.

#### **Claim 1**

In contrast to the techniques of Wood, each of Applicants' remaining claims, including independent claim 1, and independent claims 16 and 18, require a network addressable device for use with a network addressable printer object. As that term is used throughout the specification, the term printer object means a remote printer or one that is outside of the user's office network and not a part of the resources of that office network, i.e. a non-company resource. (See e.g. page 3, lines 8-26; page 4, lines -10; page 7, lines 22-33; page 8, lines 1-10; page 22, lines 3-33 and page 23, lines 1-5).

The disclosed printer objects are objects that can be addressed by network communications. The network addressable device 20 includes a document storage assembly 28 and a universal remote interface assembly 22 linked to the document storage assembly and, via the network, to the network addressable printer object 15.

According to the claims, the universal remote interface assembly receives from a remote communications device a document command for accessing the document storage assembly and identifying a particular stored document and for identifying a particular network addressable printer object and transmitting a print job for the particular stored document and print job command to the particular network addressable printer object. (See, e.g. page 4, lines 1-20; page 8, lines 11-25; page 10, lines 18-33 and page 11, lines 1-7)

Unlike Wood, no file operating or computer manipulation systems are ever loaded on the remote communications device. Applicants' specifically disclose that the remote communications device of their invention is, for example, a cell phone, PDA or the like with limited storage capacity. (See, e.g., page 1, lines 21-26). Thus, any system such as Wood that loads operating systems on the remote communications device is the exact opposite of Applicants'.

Further, nowhere in Wood or Motoyama, or any other reference of which Applicants' are aware, is it taught or suggested that a remote communications device sends identifying

information to a network addressable device such that a particular document is identified along with a particular non-resource, network addressable printer object. Likewise, nowhere is it taught or suggested that the remote communications device sends a command to send the particular identified document to the particular identified network addressable printer object.

Thus, Applicants' respectfully submit that independent claim 1, as well as independent claims 16 and 18 which include similar limitations, along with the remaining dependent claims are allowable over Wood. Applicants' therefore respectfully request that the remaining claims be reconsidered, allowed and the application passed to issue.

Likewise, Applicants' respectfully submit that no such system as disclosed and claimed by Applicant is disclosed or suggested whatsoever by the combination of Wood and Motoyama. More particularly, the Applicants respectfully submit that the combination does not result in the invention as disclosed and claimed.

Further, it is respectfully submitted that even if the combination did result in Applicant's invention, in order to combine prior art references or modify a prior art reference under 37 U.S.C. 103, there must be some teaching or suggestion in the prior art to make the combination or modification. In this case, the Examiner does not point to any teaching or suggestion in the prior art to add the SMTP protocol from Motoyama to Wood other than to state that it would have been obvious. The Examiner states it would have been obvious because one of ordinary skill in the art at the time would want to modify Wood for the purpose of making it adaptable to the protocol used for mail services.(Examiner's Office Action page 6). Again, Applicants respectfully disagree for the reason that adding the SMTP protocol to Wood as the Examiner suggests would necessarily change the principle of operation of Wood. That is, Wood is an already functioning technique for interacting with a company computer and attached company resource printer. Further, adding a SMTP protocol is completely superfluous to the Wood device.

If the proposed modification of the prior art would change the principle of operation of the prior art device, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F. 2<sup>nd</sup> 810, 123 U.S.P.Q. 349 (CCPA 1959) (see MPEP § 2143.01 at page 2100-99, second column). In the present case, it is clear that if any such SMTP protocol is to be functional then the principle by which Wood operates must be changed. Thus, in

accordance with *In re Ratti*, it could not have been obvious to make the Examiner's proposed modifications.

The Applicants therefore respectfully submit that Claim 1, as well as independent Claims 16 and 18 which require limitations similar to those in Claim 1, are not anticipated by, nor obvious over, Wood either alone or in combination with Motoyama and are entitled to allowance along with dependent claims 3-5, 7-15; 17; and 19-20 respectively.

### CONCLUSION

In light of the above, Applicants respectfully request reconsideration and allowance of Claims 1, 3-5, and 7-20. If the Examiner should feel that any issue remains as to the allowability of these claims, or that a conference might expedite allowance of the claims, the Examiner is asked to telephone the undersigned attorney.

Applicants intend this to be a complete response. No fee is believed due; however if a fee is due, please charge deposit account number indicated on the transmittal letter.

Respectfully submitted,

Date: 28 FEB 05

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